

1:22-mj-3258-TMP

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Joseph Behlke, being duly sworn, hereby state as follows:

1. I am currently a Special Agent with the Drug Enforcement Administration (DEA), where I have been employed since February 2009.
2. From June 2009 to present, I have been assigned to the DEA Cleveland District Office (CDO), Dayton Resident Office and McAllen, Texas District Office. The CDO is a multi-agency working group formed for the purpose of investigating drug related offenses occurring in/or around the CDO designated area of responsibility. I have participated in narcotics investigations with the DEA.
3. I have experience investigating drug trafficking offenses. I have participated in investigations involving cocaine, marijuana, methamphetamine, heroin, fentanyl and various other controlled substances. These investigations have resulted in arrests, convictions, and the issuance of search warrants. I have received specialized training in the enforcement of laws concerning controlled substances as found in Title 21, United States Code. In connection with my duties as a Federal law enforcement officer, I have executed search warrants and have testified in numerous judicial proceedings for violations of laws concerning controlled substances.
4. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, section 2510(7), in that I am empowered by law to conduct investigations and make arrests for offenses enumerated in Title 18, United States Code, Section 2516.
5. This affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint and warrant that on October 5, 2022, Keishawn ROBINSON, violated Title 21 U.S.C. § 841(a)(1) and (b)(1)(C) (Possession with Intent to Distribute a Controlled Substance), in the Northern District of Ohio, Eastern Division. As such, this affidavit does not include every fact known to your Affiant regarding this investigation, but will seek to summarize the relevant information. Your Affiant is familiar with the facts and circumstances of the offenses described in this Affidavit based upon Affiant's

obtaining information from law enforcement and Affiant's work. Except as otherwise noted, the information set forth in this Affidavit has been provided to your Affiant by members of the Drug Enforcement Administration (DEA), or other law enforcement officers. Unless otherwise noted, whenever in this Affidavit your Affiant asserts that a statement was made, the information was provided by another law enforcement officer (who may have had either direct or hearsay knowledge of the statement) to whom Affiant has spoken or whose forms Affiant has read and reviewed. Likewise, any information pertaining to vehicles and/or registrations, personal data on subjects, and record checks has been obtained through law enforcement databases.

PROBABLE CAUSE

6. On October 4, 2022, DEA Special Agent Joseph Behlke obtained a drug search warrant in the Northern District of Ohio under case number 1:22MJ3251-TMP and authorized by the Honorable U.S. Magistrate Judge Thomas M. Parker for 4783 Columbia Road, Unit 203, North Olmsted, Ohio. This address is known to be occupied by Keishawn ROBINSON. In addition, SA Joseph Behlke obtained a drug search warrant in the Northern District of Ohio under case number 1:22MJ3250-TMP and authorized by the Honorable U.S. Magistrate Judge Thomas M. Parker for a black Infiniti FX with Ohio Registration JDR-5218, registered to Keishawn ROBINSON. This vehicle is known to be driven by Keishawn ROBINSON.
7. On October 4, 2022, at approximately 8:00 p.m., investigators observed a blue Jeep arrive with two occupants exiting the vehicle and enter the door associated with six condo units to include Unit 203. Investigators believed that one of the subjects exiting the blue Jeep and entering the condo units to be Keishawn ROBINSON. The Ohio License Plate HWA-2752 associated with the blue Jeep is registered to EAN Holdings (Enterprise Rental).
8. On October 5, 2022, at approximately 7:20 a.m., investigators were able to determine that ROBINSON rented the blue Jeep with Ohio License Plate HWA-****.
9. On October 5, 2022, Keishawn ROBINSON was issued an arrest warrant from the Lakewood Municipal Court for Drug Trafficking (F-5) by Lakewood Municipal Court Judge Tess Neff.
10. October 5, 2022, at approximately 10:10 a.m., law enforcement personnel observed ROBINSON exit the common doorway from the condo complex, open the driver's rear door and place two white bags into the backseat. At that time, arrest team units made contact with ROBINSON and placed him under arrest.

Located on the person of ROBINSON was several bundles of U.S. currency¹, a small bag of suspected marijuana and three cellular telephones², and suspected drug scale³. ROBINSON was placed into a North Olmsted marked unit patrol car based on his arrest warrant from Lakewood Municipal Court. ROBINSON was read his *Miranda* Rights and stated he understood his rights but wished to have an attorney present before speaking with investigators. Investigators proceeded to execute the search warrant at 4783 Columbia Road, Unit 203, North Olmsted, Ohio. A North Olmsted Police Department K-9 Officer and K-9 conducted a free air sniff of the blue Jeep rental vehicle bearing Ohio License Plate HWA-**** with a positive indication of an illegal controlled substance. Investigators conducted a search of the rental vehicle wherein a black bag containing a grey powder substance was located inside of a white shopping bag. The grey powder substance was field tested resulting in the indication of fentanyl, a Schedule II controlled substance. The suspected fentanyl was processed into evidence weighing approximately 85.9 gross grams (field weight including packaging). Also located in the same bag was a small blender and a container of a white fiber powder, a suspected cutting agent⁴. Located inside a white trash bag was a glass measuring cup with white residue which field tested positive for cocaine. Lastly, investigators observed a white residue substance on the front passenger seat, which field tested positive for fentanyl. The recovered suspected controlled substances will be submitted for drug chemistry analysis.

11. Based on my training and experience, and the totality of the items recovered, the amount of fentanyl was consistent with a distribution quantity. Further, the recovered suspected fentanyl consisted of numerous doses, well beyond personal use.

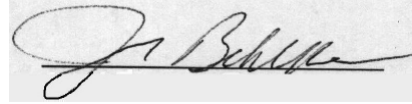
¹ Based on Affiant's training and experience, these bundles of U.S. Currency were consistent with suspected proceeds from street level drug sales.

² Based on Affiant's training and experience, it is not unusual for a drug trafficker to carry multiple cell phones.

³ Based on Affiant's training and experience, street drugs are typically sold by weight, and a digital scale is a common 'tool of the trade' of a drug trafficker.

⁴ Based on my training and experience, fiber powder is common cutting agent used by drug traffickers. Further, "cutting" is the process of adding a non-controlled substance ("filler") to a controlled substance to increase the amount of sellable drugs, and thus increase profit for the seller.

12. Based on the preceding, I believe that probable cause exists to believe that Keishawn ROBINSON has violated Title 21 U.S.C. § 841(a)(1) (b)(1)(c) (Possession with Intent to Distribute a Controlled Substance), in support of the Criminal Complaint and Warrant.



Joseph Behlke
Special Agent
Drug Enforcement Administration

Sworn to via telephone after
submission by reliable electronic
means. Crim.Rules. 4.1; 41(d)(3)



Thomas M. Parker

United States Magistrate Judge

10:21 AM, Oct 6, 2022